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15 Corsair Gaming, Inc. d/b/a CORSAIR,
16 Plaintiff,
17 v.
18 GOODS AND MORE WHOLESALE LLC,
19 Defendant.
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Case No. 3:25-cv-03091-RFL

REQUEST FOR ENTRY OF DEFAULT

Date Action Filed: April 4, 2025

1 **TO: THE CLERK OF THE ABOVE-ENTITLED COURT**

2 Plaintiff Corsair Gaming, Inc. d/b/a (“CORSAIR”) hereby requests that the Clerk of the
 3 above-entitled court enter default against Defendant Goods and More Wholesale LLC
 4 (“Defendant”). Defendant failed to appear and file a pleading or otherwise respond to the Complaint
 5 within the time prescribed by the Federal Rules of Civil Procedure. To be clear, CORSAIR served
 6 process of service on Defendant by hand at the address identified as Defendant’s “Agent” for service
 7 registered with the New York Department of State Division of Corporations, and then CORSAIR
 8 mailed process of service via U.S. mail to the same address identified as Defendant’s “Agent.”
 9 Haycock Decl. ¶¶ 3-6. CORSAIR submits that this service complies with California Code of Civil
 10 Procedure § 415.20(a). *See id.* ¶ 7.

11 On April 4, 2025, CORSAIR filed the Complaint in this action. ECF No. 1. Federal Rule of
 12 Civil Procedure 4(e)(1) authorizes service by “following state law for serving a summons in an
 13 action brought in courts of general jurisdiction in the state where the district court is located[.]”
 14 Accordingly, CORSAIR was entitled to serve Defendant pursuant to methods recognized under
 15 California law.

16 California Code of Civil Procedure § 415.20(a) permits substitute service on a limited
 17 liability company by (1) leaving the summons and complaint during usual office hours at the entity’s
 18 usual office or mailing address, with a person apparently in charge who is at least 18 years of age
 19 and informed of the contents, and (2) mailing a copy of the summons and complaint by first-class
 20 mail, postage prepaid, to the same address. Under this section, service is deemed complete on the
 21 tenth day after mailing.

22 CORSAIR complied with each statutory requirement. First, CORSAIR served process of
 23 service on Defendant by hand at the address identified as Defendant’s “Agent” for service registered
 24 with the New York Department of State Division of Corporations: ¹
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27 ¹ Available at: <https://apps.dos.ny.gov/publicInquiry/EntityDisplay> (last visited Oct. 1, 2025).
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An official website of New York State. [Here's how you know.](#)

Search



Department of State Division of Corporations

Entity Information

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Entity Details

ENTITY NAME: GOODS AND MORE WHOLESALE, LLC	DOS ID: 5740579
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/21/2020	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/21/2020	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 04/30/2022
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

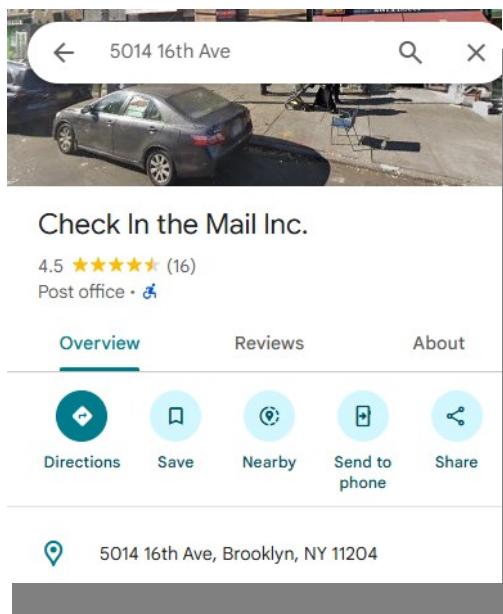
[◀](#) [ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process on the Secretary of State as Agent

The Post Office address to which the Secretary of State shall mail a copy of any process against the corporation served upon the Secretary of State by personal delivery:

Name: GOODS AND MORE WHOLESALE, LLC
Address: 5014 16TH AVENUE, SUITE 31, BROOKLYN, NY, UNITED STATES, 11204

Haycock Decl. ¶¶ 3, 5. The address for Defendant's "Agent" for service of process on the New York Department of State Division of Corporations website corresponds to a business identified as "Check In the Mail Inc.":²



² Available at: <https://maps.app.goo.gl/3ufuWqeAK2Qqmwd7> (last visited Oct. 1, 2025).

1 Haycock Decl. ¶ 4.

2 On April 21, 2025, at 3:29 p.m., CORSAIR's process server delivered the Complaint and
3 Summons to an employee of "Check In the Mail Inc." who confirmed Defendant's address and suite
4 number and accepted service of the documents. ECF No. 14. On August 7, 2025, CORSAIR mailed
5 true and correct copies of the Complaint and Summons via first-class mail, postage prepaid, to
6 Defendant at the same address. ECF No. 22. Under California Code of Civil Procedure § 415.20,
7 service was deemed complete on August 17, 2025. Haycock Decl. ¶¶ 3-7.

8 Defendant failed to file an answer or otherwise respond to the Complaint within the time
9 permitted by law. *See id.* ¶ 8. The facts in support of this request are set forth in the Declaration of
10 Jason N. Haycock, filed herewith.

11 Accordingly, CORSAIR requests the Clerk enter default against Defendant.

12 Dated: October 1, 2025

K&L GATES LLP

14 By: /s/ Jason N. Haycock

15 Jason N. Haycock
16 K. Taylor Yamahata

17 *Attorneys for Plaintiff*
18 Corsair Gaming, Inc. d/b/a CORSAIR